

7455

***RMI Company***

P. O. BOX 269
1000 WARREN AVENUE
NILES, OHIO 44448

March 15, 1989

Mr. Allen Wojtas
USEPA, Region V
230 S. Dearborn street
Chicago, Illinois 60604

Dear Mr. Wojtas:

National Carbide Corporation was a subsidiary of Air Reduction Company, Inc. In 1971, the Air Reduction Company changed its name to Airco, Inc. Airco, Inc. was purchased in 1978 by the BOC Group, Inc. Currently, Airco, Inc. is still a subsidiary of the BOC Group, Inc.

BOC Group, Inc. (DE)
85 Chestnut Ridge Road
Montvale, NJ 07645

Phone No.: 201-665-2400

Mr. Richard V. Giordano, President

D-U-N-S 00-136-8141

Very truly yours,

A handwritten signature in cursive script that reads 'Michael C. Miller'.

Michael C. Miller
Senior Environmental Engineer

TELECOPIER COVER SHEET

**RUSH***RMI Company**T-339*DATE: *3-15-89*

P. O. BOX 888
1000 WARREN AVENUE
NILES, OHIO 44124
216/544-0001 TWX 910-436-2000

PLS DELIVER TO:

*Allen Wojtas*FROM: *M. C. Miller*
NILES, OHIO 216/544-

COMPANY:

USEPA, Region V

TELEFAX NBR.

216/544-7796

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AUTOMATIC GROUP 111

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COMMENTS:

RMI Company

P. O. BOX 269
1000 WARREN AVENUE
NILES, OHIO 44446

February 17, 1989

EXPRESS MAIL

Stephen D. Ramsey, Esq.
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006

Dear Mr. Ramsey:

We acknowledge receipt of your letter dated February 14, 1989.

We are supplying at this time additional information which shows the chemical connection between IMC's activities on the brook and contamination in the brook. I hesitate to bore you with information that IMC doubtless has in its possession at present, but we desire to be cooperative.

The following are some of the information that has been highlighted in the enclosed material:

- (A.) "Approximately 59 percent of the property drains into Fields Brook and its tributaries."
- (B.) "Surface - Water Drainage Map" for the plant site is enclosed.
- (C.) Mercury in the groundwater was found to be in excess of 30 parts per billion (ppb). Mercury in the groundwater at a point 100 feet north of middle and adjacent to the plant's driveway was measured at 18 ppb. The Source Control Study will supply you the necessary data concerning groundwater recharge of Fields Brook.
- (D.) Water Table Map showing direction of groundwater flow is quite instructive.
- (E.) The lagoon dike was found to be in disrepair.
- (F.) The ditch for the mercury contaminated sludge and surface water from the lagoon area is called the IMC Tributary of Fields Brook according to the Ohio EPA (OEPA).

Stephen D. Ramsey, Esq.
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(G.) The IMC Trib has contained water with mercury levels at 23.9 ppb.

(H.) In 1979, IMC stated to the OEPA:

"Storm water run-off contaminated by unrecorded past process spills occurring before December 1977. The amount of run-off is unknown. Run-off was observed at 1:00 P.M. on 3-19-79 and was dammed off at OEPA's request by noon on 3-20-79.

"The product was not neutralized or recovered."

On a personal note (not as a representative of the "Settling Companies"), I genuinely desire an opportunity to gain an insight into the practice legal bases under Superfund for many of the points eloquently raised in your letter. Perhaps at some point, if IMC settles, you will give me an opportunity to learn and grow.

Sincerely,

Joe T. Holman
Director
Environmental Affairs

Enclosures